

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	
)	No. 16-cr-10305-NMG
MARTIN GOTTESFELD,)	
)	
Defendant.)	

**ASSENTED-TO MOTION FOR ENDS-OF-JUSTICE CONTINUANCE,
AND EXCLUSION OF TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through the undersigned Assistant United States Attorneys, and with the assent the defendant as set forth in Court on May 15, 2017, respectfully moves this Court to grant a continuance of the time within which the trial of the charged offenses must commence, and exclude from the speedy trial clock the time period from May 15, 2017, through and including June 5, 2017—the date the Court has set for the final status conference.

The Court had previously scheduled a final status conference in this matter for May 15, 2017. At the May 15, 2017 status conference, defense counsel stated that the Defendant is considering once again retaining counsel and requested a further, final status conference in order to determine the status of the defendant's representation. The Court granted defense counsel's request and set a final status conference for June 5, 2017.¹

Given the current status of the matter, the parties agree that a continuance of the date by which a trial in this matter must commence is necessary so as to: (1) to allow the Defendant to determine whether he will seek to retain new counsel and for the Court to rule on any related motions; and (2) provide the defendant and his counsel (whether current or newly retained)

¹ Defendant was previously represented by retained counsel Tor Eckland, Esq. Defendant sought new counsel, and Attorney Eckland moved to withdraw from the case on November 28, 2016. (Dkt. No. 45). The Court granted the motion and appointed Assistant Federal Defender Timothy Watkins to represent Defendant. (Dkt. No. 46). Assistant Federal Defender Watkins has represented Defendant since that time.

reasonable time to review and assess the discovery that has been produced in this case. The parties further agree that the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. §§ 3161(h)(7)(A), 3161(h)(7)(B)(i), and 3161(h)(7)(B)(iv). *See also* 18 U.S.C. § 3161(h)(1)(G).

Respectfully submitted,

WILLIAM D. WEINREB
ACTING UNITED STATES ATTORNEY

By: /s/ David J. D'Addio
David J. D'Addio
Assistant U.S. Attorney

Date: May 22, 2017

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ David J. D'Addio

David J. D'Addio

Assistant United States Attorney

Date: May 22, 2017